



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EAG/AL  
F.#2011R01745

*271 Cadman Plaza East*

*Brooklyn, New York 11201*

January 12, 2012

By ECF

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Re: United States v. Joseph Petillo  
Criminal Docket No. 11-791 (FB)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby discloses that it anticipates calling Investigator John Carillo as an expert witnesses at trial.

Investigator Carillo will testify as an expert regarding (1) the structure, hierarchy, rules and conduct of organized crime, (2) the identities, affiliations and positions of individuals who are members or associates of organized crime, including in the Colombo and Bonanno crime families (except that Investigator Carillo will not identify the organized crime position and affiliation of the defendant, consistent with established case law), (3) the identities, affiliations and positions of individuals depicted in photographs to be admitted at trial, (4) organized crime terminology and code language, and (5) the operation of extortion and loansharking schemes. More detail regarding the bases for Carillo's anticipated testimony and his qualifications can be found within the government's forthcoming Jencks Act disclosure for this witness.

The government reserves the right to call a substitute expert witness as well as to call additional expert witnesses, and will provide advance notice of any intent to do so.

Please contact us if you have any questions regarding this disclosure.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney  
Eastern District of New York

By:                     /s/                      
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cc: Clerk of the Court (FB) (by ECF)